

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE HUDSON'S BAY COMPANY DATA
SECURITY INCIDENT CONSUMER
LITIGATION

Case No. 1:18-cv-08472 (PKC)

**PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES, AND SERVICE AWARDS**

Plaintiffs in the above-captioned action ("Plaintiffs"), by and through their attorneys, respectfully move this Court for an Order granting payment of \$1,346,799.40 for Plaintiffs' Counsel's attorneys' fees, \$53,200.60 for reimbursement of litigation expenses, and \$1,000 to each of the 15 Plaintiffs (totaling \$15,000) as Service Awards for their efforts and contributions to this Litigation.

In support of this motion, Plaintiffs rely on the attached Memorandum of Law, the Joint Declaration and its supporting exhibits, declarations submitted by Plaintiffs' Counsel, declarations submitted by Plaintiffs, all documents filed therewith, and the arguments of counsel.

Dated: October 29, 2021

Respectfully Submitted,

/s/ Janine L. Pollack

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*Interim Co-Lead Counsel for
Plaintiffs and the Class*

CERTIFICATE OF ELECTRONIC SIGNATURE CONSENT

Pursuant to S.D.N.Y. Electronic Case Filing Rules & Instructions Section 8.5(b), I, Timothy J. Peter, represent that Janine L. Pollack consented to her electronic signature being used in this document.

/s/ Timothy J. Peter
Timothy J. Peter (admitted *pro hac vice*)